

**Special Verdict Form**

1. Has [plaintiff] proven by a preponderance of the evidence that [defendant] violated federal law by discriminating against [her/him] on the basis of sex by paying [her/him] less than [male/female] workers in jobs that require substantially equal skill, effort and responsibility, and that are performed under similar working conditions?

Yes\_\_\_\_\_ No\_\_\_\_\_

If “no,” answer no further questions. If “yes,” proceed to next question.

2. Has [plaintiff] proven that [defendant] committed this violation of federal law willfully?

Yes\_\_\_\_\_ No\_\_\_\_\_

If “no,” proceed to next question. If “yes,” proceed to question 4.

2. What damages do you award [plaintiff] to compensate [her/him] for lost pay and/or benefits that [she/he] would have received from [defendant], from [date *two* years before plaintiff filed his or her complaint] until today, if the sex discrimination had not occurred?

Yes\_\_\_\_\_ No\_\_\_\_\_

Answer no further questions.

4. What damages do you award [plaintiff] to compensate [her/him] for lost pay and/or benefits that [she/he] would have received from [defendant], from [date *three* years before plaintiff filed his or her complaint] until today, if the sex discrimination had not occurred?

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